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COUNSEL TO THE DEBTORS AND
DEBTORS IN POSSESSION

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

In re:	§	
	§	Chapter 11
	§	
Senior Care Centers, LLC, <i>et al.</i> , ¹	§	Case No. 18-33967 (BJH)
	§	
Debtors.	§	(Jointly Administered)
	§	

**NOTICE OF AGENDA OF MATTERS SCHEDULED
FOR HEARING ON NOVEMBER 5, 2019 AT 2:00 P.M. (CT)**

MATTERS GOING FORWARD AS STATUS CONFERENCES

1. Application for Allowance and Payment of Administrative Claim Filed: by Michael Brandley [Docket No. 608; Filed: 03/01/2019]

Related Document(s):

- a) Stipulation and Agreed Order Concerning Application for Allowance and Payment of Administrative Claim Filed: by Michael Brandley [Docket No. 921; Entered 04/11/2019]
- b) Amended Notice of Status Conference [Docket No. 1535; Filed: 07/16/2019]

¹ The Debtors in the Chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are set forth in the *Order (I) Directing Joint Administration of Chapter 11 Cases, and (II) Granting Related Relief* [Docket No. 569] and may also be found on the Debtors' claims agent's website at <https://omnimgt.com/SeniorCareCenters>. The location of the Debtors' service address is 600 North Pearl Street, Suite 1100, Dallas, Texas 75201.

Responses Received:

- a) CIBC Bank USA's Response to the Application for Allowance and Payment of Administrative Claim Filed: by Michael Brandley and Reservation of Rights [Docket No. 1348; Filed: 06/14/2019]

Status: This matter will go forward as a status conference.

- 2. Motion of Debtors for Entry of an Order (I) Approving Procedures Relating to Closure of a Skilled Nursing and Assisted Living Facility, (II) Authorizing the Abandonment of Certain Property in Connection Therewith, (III) Approving Use of Said Procedures and Abandonment for Other Potential Closures, With Additional Notice to Applicable Landlord and Regulatory Authorities, and (IV) Granting Related Relief [Docket No. 1918; Filed: 09/20/2019]

Objection Deadline: October 11, 2019

Related Documents:

- a) Notice of Hearing [Docket No. 1919; Filed: 09/20/2019]
- b) Response to Objections to Debtors' Motion for Entry of Order Approving Procedures Related to Closure of Skilled Nursing Facilities and Related Relief [Docket No. 2030; Filed: 10/14/2019]

Responses Received:

- a) The United States of America's Objection to Motion of Debtors for Entry of an Order (I) Approving Procedures Relating to Closure of a Skilled Nursing and Assisted Living Facility, (II) Authorizing the Abandonment of Certain Property in Connection Therewith, (III) Approving Use of Said Procedures and Abandonment for Other Potential Closures, With Additional Notice to Applicable Landlord and Regulatory Authorities, and (IV) Granting Related Relief [Docket No. 2005; Filed: 10/11/2019]
- b) Granite Landlords Objection to Motion of Debtors for Entry of an Order (I) Approving Procedures Relating to Closure of a Skilled Nursing and Assisted Living Facility, (II) Authorizing the Abandonment of Certain Property in Connection Therewith, (III) Approving Use of Said Procedures and Abandonment for Other Potential Closures, With Additional Notice to Applicable Landlord and Regulatory Authorities, and (IV) Granting Related Relief [Docket No. 2018; Filed: 10/11/2019]

- c) Objection of White Oak Healthcare Finance, LLC to Motion of Debtors for Entry of an Order (I) Approving Procedures Relating to Closure of a Skilled Nursing and Assisted Living Facility, (II) Authorizing the Abandonment of Certain Property in Connection Therewith, (III) Approving Use of Said Procedures and Abandonment for Other Potential Closures, With Additional Notice to Applicable Landlord and Regulatory Authorities, and (IV) Granting Related Relief [Docket No. 2019; Filed: 10/11/2019]

Status: This matter will go forward with respect to Clear Brook SCC, LLC. This matter will go forward as a status conference with regard to procedures for further facilities.

3. Application for Administrative Expense Claim Filed: by Creditor Granite Landlords [Docket No. 640; Filed: 03/06/2019]
4. Motion for Entry of an Order Granting Adequate Protection Pursuant to 11 U.S.C. §§ 361 and 363 Filed: by Granite Landlords [Docket No. 641; Filed: 03/06/2019]
5. Granite Landlords' Motion to Enforce Terms of Settlement Agreement with the G-Debtors [Docket No. 1533; Filed: 07/15/2019]

Status: These matters will go forward as to the status of the transition of the Granite Facilities and the resolution announced at the hearing on October 22, 2019.

UNCONTESTED MATTERS GOING FORWARD

6. Omnibus Motion for Entry of an Order (I) Authorizing the Debtors to Reject Executory Contracts and Unexpired Leases, and (II) Granting Certain Related Relief [Docket No. 2001; Filed: 10/10/2019]

Objection Deadline: October 31, 2019

Related Documents:

- a) Notice of Hearing [Docket No. 2002; Filed: 10/10/2019]

Responses Received:

- a) None.

Status: This matter will go forward on an uncontested basis.

7. Motion of Debtors for Entry of an Order (I) Approving Settlement Agreement [with Partners Pharmacy, LLC] and (II) Granting Related Relief [Docket No. 2016; Filed: 10/11/2019]

Objection Deadline: November 1, 2019

Related Documents:

- a) Notice of Hearing [Docket No. 2017; Filed: 10/11/2019]
- b) Amended Notice of Hearing [Docket No. 2024; Filed: 10/14/2019]

Responses Received:

- a) CIBC Bank USA's Response to the Motion of Debtors for Entry of an Order (I) Approving Settlement Agreement, and (II) Granting Related Relief [Docket No. 2110; Filed: 10/29/2019]

Status: CIBC has agreed to stand down on its objection. As such, this matter will go forward on an uncontested basis.

8. Expedited Motion of Debtors for Entry of an Order (I) Approving Settlement Agreement [with Willacy Healthcare, Inc., and (II) Granting Related Relief [Docket No. 2108; Filed: 10/28/2019]

Objection Deadline: November 1, 2019

Related Documents:

- a) Request for Expedited Consideration of Motion [Docket No. 2109; Filed: 10/28/2019]

Responses Received:

- a) None.

Status: This matter will go forward on an uncontested basis.

9. Expedited Motion of Debtors for Entry of an Order (I) Approving Form of Operations Transfer Agreement, (II) Authorizing Transfer of the Operations and Related Assets of a Certain Facility Free and Clear of All Liens, Claims, Encumbrances, and Interests, and (III) Granting Related Relief [Docket No. 2107; Filed: 10/28/2019]

Objection Deadline: November 1, 2019

Related Documents:

- a) Request for Expedited Consideration of Motion [Docket No. 2109; Filed: 10/28/2019]

Responses Received:

- a) None.

Status: This matter will go forward on an uncontested basis.

10. Application for Authority to Employ Foley & Lardner LLP as Granite Conflicts Counsel to the Debtors Pursuant to Sections 327(a) and 328(a) of the Bankruptcy Code [Docket No. 2086; Filed: 10/23/2019]

Related Documents:

- a) Notice of Hearing [Docket No. 2093; Filed: 10/24/2019]

Responses Received:

- a) None.

Status: This matter will go forward on an uncontested basis.

11. Debtors' Supplemental Application for Entry of an Order Approving the Expanded Scope of Services of H2C Analytics, LLC as Investment Banker to the Debtors [Docket No. 2009; Filed: 10/11/2019]

Objection Deadline: November 1, 2019

Related Documents:

- a) Notice of Hearing [Docket No. 2010; Filed: 10/11/2019]

Responses Received:

- a) None.

Status: This matter will go forward on an uncontested basis.

12. First Interim Fee Application of H2C Analytics, LLC for Compensation and Reimbursement of Expenses as Investment Banker to the Debtors for the Period from December 19, 2018 Through July 31, 2019 [Docket No. 2008; Filed: 10/11/2019]

Objection Deadline: November 1, 2019

Related Documents:

- a) Notice of Hearing [Docket No. 2010; Filed: 10/11/2019]

Responses Received:

- a) None.

Status: This matter will go forward on an uncontested basis.

13. Second Interim Application of BDO USA, LLP to Provide a Chief Executive Officer, Chief Financial Officer, and Additional Personnel for the Period March 1, 2019 Through and Including June 30, 2019 [Docket No. 1933; Filed: 09/26/2019]

Objection Deadline: October 21, 2019

Related Documents:

- a) Notice of Hearing [Docket No. 1941; Filed: 09/26/2019]
- b) Certificate of No Objection [Docket No. 2104; Filed: 10/28/2019]

Responses Received:

- a) None.

Status: A certificate of no objection has been filed. No hearing is necessary unless the Court directs otherwise.

14. Final Fee Application of Stephen Duck, CPA for Compensation and Reimbursement of Expenses as Cost Report Accountants to the Debtors and Debtors in Possession for the Period from April 2, 2019 Through June 30, 2019 [Docket No. 2020; Filed: 10/13/2019]

Objection Deadline: November 1, 2019

Related Documents:

- a) Notice of Hearing [Docket No. 2023; Filed: 10/14/2019]

Responses Received:

- a) None.

Status: This matter will go forward on an uncontested basis.

15. Debtors' Expedited Motion for Entry of an Order (I) Approving Entry Into Financing Term Sheet, (II) Authorizing Payment of Related Fees, and (III) Granting Related Relief [Docket No. 2123; Filed: 10/30/2019]

Objection Deadline: November 4, 2019

Related Documents:

- a) Motion for Expedited Consideration of the Debtors' Motion for Entry of an Order (I) Approving Entry Into Financing Term Sheet, (II) Authorizing Payment of Related Fees, and (III) Granting Related Relief [Docket No. 2124; Filed: 10/30/2019]

- b) Notice of Hearing [Docket No. 2132; Filed: 10/31/2019]

Responses Received:

- a) None.

Status: This matter will go forward on an uncontested basis.

CONTESTED MATTERS GOING FORWARD

- 16. Motion of Dental Management, LLC for Protective Order as to Notice of Deposition Duces Tecum [Docket No. 2049; Filed 10/16/2019]

Related Documents:

- a) Motion of Onsite Dentists of Texas, PLLC, Texas Nursing Home Management Solutions, LLC d/b/a Atlas Dental Group for Setting and Request for Expedited Hearing of Motions for Protective Order [Docket No. 2113; Filed 10/29/2019]
- b) Notice of Hearing [Docket No. 2131; Filed: 10/30/2019]

Responses Received:

- a) Lenders' Response to Motion of Atlas Dental Management, LLC for Protective Order as to Notice of Deposition Duces Tecum [Docket 2137; Filed: 10/31/2019]

Status: This matter will go forward on a contested basis.

- 17. First Amended Motion of Onsite Dentists of Texas, PLLC for Protective Order as to Notice of Deposition Duces Tecum [Docket No. 2051; Filed: 10/16/2019]

Related Documents:

- a) Motion of Onsite Dentists of Texas, PLLC, Texas Nursing Home Management Solutions, LLC d/b/a Atlas Dental Group for Setting and Request for Expedited Hearing of Motions for Protective Order [Docket No. 2113; Filed 10/29/2019]
- b) Notice of Hearing [Docket No. 2131; Filed: 10/30/2019]

Responses Received:

- a) Amended Lenders' Response to the First Amended Motions of Onsite Dentists of Texas PLLC and Texas Nursing Home Management Solutions, LLC for Protective Order as to Notice of Deposition Duces Tecum [Docket No. 2128; Filed: 10/30/2019]

Status: This matter will go forward on a contested basis.

18. First Amended Motion of Texas Nursing Home Management Solutions, LLC for Protective Order as to Notice of Deposition Duces Tecum [Docket No. 2052; Filed: 10/16/2019]

Related Documents:

- a) Motion of Onsite Dentists of Texas, PLLC, Texas Nursing Home Management Solutions, LLC d/b/a Atlas Dental Group for Setting and Request for Expedited Hearing of Motions for Protective Order [Docket No. 2113; Filed 10/29/2019]
- b) Notice of Hearing [Docket No. 2131; Filed: 10/30/2019]

Responses Received:

- a) Lenders' Response to the First Amended Motions of Onsite Dentists of Texas PLLC and Texas Nursing Home Management Solutions, LLC for Protective Order as to Notice of Deposition Duces Tecum [Docket No. 2126; Filed: 10/30/2019]

Status: This matter will go forward on a contested basis.

19. Lenders' Motion for a HIPAA Qualified Protective Order Concerning the Debtors' 9019 Motion and Dental Adversary Proceedings [Docket No. 2115; Filed: 10/29/2019]

Related Documents:

- a) Motion for Expedited Hearing on Lenders' Motion for a HIPAA Qualified Protective Order Concerning the Debtors' 9019 Motion and Dental Adversary Proceedings [Docket No. 2116; Filed: 10/29/2019]
- b) Notice of Hearing [Docket No. 2122; Filed: 10/30/2019]

Responses Received:

- a) None.

Status: This matter will go forward on a contested basis.

MATTERS NOT GOING FORWARD

20. Motion of Debtors for Entry of Order Authorizing Payment of Prepetition Claims Owing to Employee Benefits Administrators and Third Party [Docket No. 1026; Filed: 04/30/2019]

Objection Deadline: May 21, 2019

Related Documents:

- a) Notice of Errata Re Motion of Debtors for Entry of Order Authorizing Payment of Prepetition Claims Owing to Employee Benefits Administrators and Third Party [Docket No. 1028; Filed: 04/30/2019]
- b) Notice of Hearing [Docket No. 1555; Filed: 07/18/2019]

Responses Received:

- a) Limited Response of Century Healthcare, LLC to Motion of Debtors for Entry of an Order Authorizing Payment of Prepetition Claims Owing to Employee Benefits Administrators and Third Party Providers [Docket No. 1096; Filed: 5/16/2019]
- b) UMR Inc.'s Limited Objection to Motion of Debtors for Entry of Order Authorizing Payment of Prepetition Claims Owing Administrators and Third Party Providers [Docket No. 1151; Filed: 5/20/2019]
- c) Objection of the Official Committee of Unsecured Creditors of Senior Care Centers, LLC, Et Al., to the Debtors' Motion for Entry of Order Authorizing Payment of Prepetition Claims Owing to Employee Benefits Administrators and Third party Providers [Relates to Docket Nos. 15, 78, 231, 1026] Docket No. 1165; Filed: 5/21/2019]
- d) CIBC Bank USA's Response to the Motion of Debtors for Entry of Order Authorizing Payment of Prepetition Claims Owing to Employee Benefits Administrators and Third Party Providers [Docket No. 1166; Filed: 5/21/2019]

Status: This matter will not go forward.

Dated: November 1, 2019
Dallas, Texas

Respectfully submitted,

POLSINELLI PC

/s/ *Trey A. Monsour*

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